

STATE OF MARYLAND DEPARTMENT OF THE ENVIRONMENT LAND MANAGEMENT ADMINISTRATION SOLID WASTE PROGRAM REPORT OF OBSERVATIONS

TYPE OF INSPECTION: Joint Inspection with EPA

DATE: June 2, 2015

FACILITY NAME: 4004 East Monument Street, Baltimore MD

- 1. I met Andrew Ma of EPA at the site @0830 hrs and we then proceeded to enter the facility with Mr. Arthur Nagy, who is currently renting the property. He had operated Plating & Anodizing Sales at 603 Dundalk Avenue prior to moving to the current address. The purpose of the inspection was to determine where the chemicals that had been stored in Dundalk had been moved. EPA has an existing Consent Agreement (CA) with American Plating, which apparently has gone out of business. The CA included a groundwater assessment that is being conducted by USACE for EPA. The Agency needed a site update to determine whether further action is required.
- 2. Mr. Nagy indicated that he intends to purchase the property, which he believes is still owned by Monumental Properties. He would operate a business selling plating chemicals and equipment. He also discussed possibly treating materials left onsite by the former operator. We then toured the facility, which had poor lighting and a leaking roof. The lighting condition unfortunately degraded some of the photographs taken, but all are attached for the record.
- 3. In the outside area, two rolloffs containing scrap metal remained parked, along with a shipping container storing packaging materials, largely cardboard. Several 55 gallon metal drums were also observed in the open area near one building entrance.
- 4. Inside the building there is a plating facility, with some plating lines partially or totally decommissioned. Mr. Nagy provided a drawing of the operation. Twenty six 55 gallon drums, eight containing chemicals, a number of closed tanks, and many open-top plating tanks were still onsite.
- 5. Also present were many containers of chemicals, stored mainly in the former chromium department area, that Mr. Nagy stated were materials he had moved from 603 Dundalk Avenue. There were 55 gallon drums, smaller drums, one gallon bottles among other containers. I again asked Mr. Nagy to provide an inventory of the chemicals he had onsite and he agreed to provide one in a week, citing the difficulty of finding paper work in the midst of a move. He also indicated that empty containers previously held in the enclosed courtyard at the Dundalk site had been placed in the warehouse. Due to poor lighting and generally poor housekeeping it was not possible to determine which

- chemicals exactly were onsite, although a small container of solid hexavalent chromium containing material and several containing trivalent chromium were mentioned. Strong acids including sulfuric, nitric, and hydrochloric acids, and sodium hydroxide were also on site.
- 6. Mr. Nagy mentioned that he might treat some chemicals, and Mr. Ma informed him that he could not treat hazardous wastes without a permit. Mr. Nagy informed that he would notify the agencies prior to treating any materials. He also said that the site had a pretreatment permit from the City that he needed to renew.
- 7. Mr. Ma will discuss how to proceed with the case for EPA and I will talk to MDE management for guidance. At this point it appears that the site could become a hazardous waste generator at a minimum and so would need continuing MDE oversight.

OBSERVER

PERSON INTERVIEWED

J. Leizear

Arthur Nagy